

## **REMARKS**

In response to the Non-Final Office Action mailed on February 27, 2007, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Claims 1, 21, and 22 have been amended, leaving Claims 1 – 22 for consideration upon entry of the present amendment. No new matter has been added by the amendments.

### **Support for Claim Amendments**

The amendments to Claims 1, 21, and 22 are fully supported in Applicant's specification. See, for example, paragraphs [0016] – [0019].

### **Claim Rejections 35 U.S.C. §102**

Claims 1-11, 15, and 17-22 stand rejected under 35 U.S.C. §102 as allegedly being anticipated by Matula U.S. Patent Publication No. 2002/0165995 hereinafter referred to as "Matula". Applicant respectfully traverses.

Claim 1 recites, "A method for providing a meta-data programming language level interface, the method comprising: receiving an object name from a client program via a meta-data retrieval API, wherein said object name corresponds to a runtime object instance located in a runtime environment that includes one or more methods; requesting meta-data associated with said runtime object instance from said runtime environment; receiving said meta-data for each said method included in said runtime object instance; and transmitting said meta-data for each said method to said client program via said meta-data retrieval API." (Emphasis added.)

Matula teaches an implementation of a Java Metadata Interface (JMI) that implements a package proxy JMI interface on a package proxy request, a class proxy JMI

interface on a class proxy request, and a class instance JMI interface on a class instance request (Abstract). The request is associated with a metamodel that includes at least one package, the package includes at least one class, and the class includes at least one attribute reference or operation (Abstract). A metamodel is modeling language for describing different kinds of data, such as specifying a database system table that describes the format of a table definition (Matula, paragraph [0010]). Applications access information in a meta object facility (MOF) using a set of application program interfaces mapped through an interface definition language (Matula, paragraph [0012] and [0013]). However, the metamodels are stored in a storage element of a repository, and thus are not runtime object instances in a run-time environment (Matula, Fig. 2, 200, paragraph [0015], Fig. 5, repository 500, metamodel storage 510, paragraph [0050]). Matula teaches avoiding the manual step 210 of FIG. 2 by dynamically generating an interface to the stored metamodel content (paragraphs [0050] and [0075]). Thus, while words such as “dynamic” and “runtime” appear in Matula, the context is entirely different from the instant application, as the metamodel “objects” to which the JMI “dynamically” interfaces with are not themselves runtime object instances in a run-time environment.

Therefore, Claim 1 is not anticipated by Matula for at least the reason that Matula fails to disclose, either expressly or inherently, all elements recited in amended Claim 1.

Since they contain similar features, Applicant respectfully submits that Claims 21 and 22 are patentable over Matula for at least the reasons given above for Claim 1. Claims 2 – 11, 15, and 17 – 20 depend from Claim 1, and thus are believed to be allowable at least due to their dependency on Claim 1.

Further, in rejecting Claims 4 – 11, 15, 17-19, and 21-22, the Examiner’s sole reliance upon the Brief Description of the Invention in paragraph [0018] of Matula is misplaced. Contrary to the Examiner’s assertion, paragraph [0018] of Matula simply does not expressly or inherently disclose elements such as: **a Java meta-data type, a Java interface meta-data type, a Java parameter meta-data type, a Java exceptions meta-data type, wherein said meta-data describes an exception, wherein said meta-**

**data describes a return type, and wherein said object name corresponds to a runtime object instance located in a runtime environment.**

### **Claim Rejections - 35 U.S.C. § 103**

Claims 12-14, 16 and 20 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Matula in view of the applicant's choice of merely selecting a specific programming language to utilize, such as C++ or how data is retrieved. Applicant respectfully traverses.

As stated above, Matula fails to disclose all of the elements of Claim 1, from which Claims 12-14, 16 and 20 depend. The use of "design choice" does not cure this defect. Moreover, inclusion of source code meta-data, as recited in Claim 20, is far from a mere design choice, as the inclusion of source code directly opposes the purpose of Matula's metamodels. Matula's metamodels are for abstractly defining models, and thus there is no motivation to include source code (Matula, paragraph [0007]). Accordingly, neither Matula nor design choice, alone or in combination, teaches or suggests all of the elements of Claims 12-14, 16 and 20. Applicant respectfully submits that Claims 12-14, 16 and 20 are allowable at least due to their dependency on Claim 1.

### **Conclusion**

The arguments and amendments presented herein are made for the purposes of better defining the invention, rather than to overcome the rejections for patentability. The claims have not been amended to overcome the prior art and therefore, no presumption should attach that either the claims have been narrowed over those earlier presented, or that subject matter or equivalents thereof to which the Applicant is entitled has been surrendered. Allowance of the claims is respectfully requested in view of the above

remarks. Moreover, no amendments as presented alter the scope of the claimed invention and therefore cannot necessitate a new grounds rejection.


In view of the foregoing remarks and amendments, Applicant submits that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

In the event the Examiner has any queries regarding the instantly submitted response, the undersigned respectfully request the courtesy of a telephone conference to discuss any matters in need of attention.

If there are any additional charges with respect to this Response or otherwise, please charge them to Deposit Account No. 09-0463.

Respectfully Submitted,  
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